

removal; (3) pursuant to the Court's inherent powers, enjoining Simpson from any further removal of this proceeding without the prior permission of this Court; (5) holding and adjudging Simpson and Rajotte in civil contempt of the Commercial Division's March 11, 2025 Order Appointing a Temporary Receiver and the Commercial Division's May 13, 2025 Decision and Order and May 12, 2025 Order Compelling Jeffrey Simpson to Comply with the Receivership Order and Directing Sherriff to Enforce Receivership Order (together the "Orders"), ordering Simpson be incarcerated until he complies with the Orders, and holding a hearing to adjudicate Chassen's damages as against Simpson and Rajotte and (6) granting an immediate injunction pending the hearing of this motion enforcing the Orders and directing the United States Marshal's Service to enforce the Orders; and (7) granting such other and further relief this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to S.D.N.Y Local Rule 6.1, and the Court's Individual Rules, unless otherwise directed by the Court, any opposing affidavits or answering memoranda must be served within fourteen (14) days of service of the moving papers, and any reply must be served within seven (7) days of service of any answering papers.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Individual Rule 2(b)(ii), the undersigned hereby certifies that he used his best efforts to resolve informally the matters raised in this motion, which efforts were unsuccessful.

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Dated: New York, New York
May 27, 2025

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